

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

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**IN RE GENETICALLY MODIFIED RICE  
LITIGATION**

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**ALL CASES**

and

**IN THE CIRCUIT COURT OF ARKANSAS COUNTY, ARKANSAS  
STUTTGART DISTRICT  
(CIVIL DIVISION)**

**CASE NO. CV-2008-108**

Meins, et al.  
v. Bayer AG, et al.

**CROSS-NOTICE AND NOTICE OF  
DEPOSITION OF RICELAND 30(B)(6)**

PLEASE TAKE NOTICE that pursuant to Federal and Arkansas Rules of Civil Procedure 30(b)(6), Defendants Bayer CropScience LP, Bayer CropScience Inc., Bayer CropScience Holding Inc., Bayer CropScience LLC, and Bayer Corporation (“Bayer Defendants”), hereby notice and cross-notice the following deposition being taken in and for the purposes of this action. Bayer Defendants will take the deposition of the above-referenced Deponent at the date, time and location specified. The deposition shall be taken by stenographic means before a notary public, or other person authorized to take oaths, and shall continue from day to day until completed.

<b>Deponent</b>	<b>Location</b>	<b>Date</b>	<b>Time</b>
Riceland Foods, Inc. 30(b)(6) representative	Barrett & Deacon <b>Jonesboro Office</b> Mercantile Center 300 South Church Street Third Floor Jonesboro, AR 72401-2911	April 13, 2010	8:30 AM

Pursuant to Federal and Arkansas Rule of Civil Procedure 30(b)(6), for each deponent, you are requested to designate one or more officers, directors or managing agents, or other persons who consent to testify on the deponent's behalf, and to testify to the matters known to or reasonably available to the deponent for the topics covered by **Schedule A** attached to this Notice.

Pursuant to the Deposition Protocol set forth in the Agreed Order Setting Deposition Protocol entered December 3, 2007, please provide notice of intent to attend a deposition by contacting Renée Grimmertt at [renee.grimmertt@bartlit-beck.com](mailto:renee.grimmertt@bartlit-beck.com) or (303) 592-3168, with the names and party affiliations of those who plan on attending the deposition at least seven (7) days before the deposition.

All parties are invited to appear and participate as they deem fit and proper and as permitted by the Federal Rules of Civil Procedure and the relevant Orders entered in these actions.

Dated this 6th day of April, 2010.

Respectfully submitted,

/s/ Eric R. Olson

Eric R. Olson

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Joseph J. Stroble  
Elizabeth M. Gates  
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***ATTORNEYS FOR THE BAYER DEFENDANTS***

**CERTIFICATE OF SERVICE**

This is to certify that I have this 6th day of April, 2010, electronically filed a copy of the foregoing with the Clerk of Court to be served by operation of the Court's electronic filing system upon the parties of record and served upon the state court parties by US Mail.

/s/ Eric R. Olson

Eric R. Olson

## **SCHEDULE A**

The identity, location, name, custodian, author, and recipient of documents created and/or maintained by Riceland that contain, reflect, summarize and/or communicate financial and accounting information, including, but not limited to:

- 1) The identity, location, name, custodian, author, and recipient of documents created and/or maintained by Riceland that contain, reflect, summarize and/or communicate financial and accounting information, including, but not limited to:
  - a. all costs incurred by Riceland related to the purchase, storage, milling, processing, packaging, shipment, or any other step in Riceland's long grain rice businesses;
  - b. all income received by Riceland related to the purchase, storage, milling, processing, packaging, shipment, or any other step in Riceland's long grain rice businesses;
  - c. all calculations, summaries, descriptions, or statements relating to margins, profits, cost of goods sold, or similar information;
  - d. financial statements or similar documents;
  - e. profit and loss statements or similar documents;
  - f. hedging costs, profits, transactions, summaries, or analysis; or
  - g. statements prepared for external auditors, banks, lenders, accountants, tax preparers, consultants, USDA or other entities or governments for whom financial or inventory data is prepared.
- 2) The type of computer or storage system(s) used to collect, maintain, search, and/or store Riceland's financial and accounting information, including but not limited to:
  - a. the time frame of use,
  - b. the scope and date of the data or information stored,
  - c. methods of searching or extracting data or information, f
  - d. format of the data or information (including any extracted or exported data or information),
  - e. any automatic deletion of data or information by the system,
  - f. and any backup or duplication systems containing any such financial or accounting information.